

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DONALD BELL; KATRINA BELL,

Plaintiffs,

v.

**TRAVELERS PROPERTY CASUALTY
INSURANCE COMPANY,**

Defendants,

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Civil Action No. 2:05-cv-658-M

**PLAINTIFFS' RESPONSE TO ORDER
TO SHOW CAUSE REGARDING DISCOVERY**

COME NOW the Plaintiffs, and hereby respond to this Court's Order to show cause as to why sanctions should not be granted by stating unto the Court the following:

1). Defendants served discovery requests, which included interrogatories, on the Plaintiffs on or about October 5, 2005. (Exhibit "A").

2). Plaintiffs' counsel believed that the interrogatories, including subparts, greatly exceeded to the amount allowed by this Court's Scheduling Order as well as Rule 33 of the Federal Rules of Civil Procedure. (Scheduling Order, Exhibit "B")

3). Based upon the aforesaid belief, Plaintiffs answered the believed maximum allowable interrogatories propounded upon them by Defendants. (Exhibit "C").

4). Plaintiffs counsel received this Court's Order of January 31, 2006 and has since answered the outstanding discovery in question as Ordered.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs' respectfully request that sanctions not be levied against them.

/s/ Christopher E. Sanspree

CHRISTOPHER E. SANSPREE

Attorney for Plaintiffs

OF COUNSEL:

**BEASLEY, ALLEN, CROW,
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CERTIFICATE OF SERVICE

I hereby certify that I have filed the original of the foregoing document in this Court with copies to be served upon all Defendants of record as listed below by placing a copy of same in the United States Mail, first class, postage prepaid on this the 6th day of **February** 2006.

/s/ Christopher E. Sanspree
OF COUNSEL

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